

April 6, 2000

VIA OVERNIGHT MAIL

Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RECEIVED
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EXECUTIVE SECRETARY

MARK ALLEN
DEBORAH GODWIN
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TIMOTHY TAYLOR
BOBBY F. MARTIN, JR.

PARALEGALS:
LIBBY BELT
ANDREA M. SCALES
CAFFI M. KIRK
LAURA R. PERRY

* ALSO ADMITTED IN INDIANA



RE: Application of Memphis Networx, LLC for a Certificate of Public Convenience and Necessity to Provide Interstate Telecommunication Services and Joint Petition of Memphis Light, Gas & Water Division, a Division of the City of Memphis, Tennessee ("MLG&W") and A&L Networx-Tennessee, LLC ("A&L") for Approval of an Agreement Between MLG&W and A&L Regarding Ownership of Memphis Networx, LLC

TRA Docket No. 99-00909

Dear Mr. Waddell:

Please find enclosed an original and thirteen (13) copies of the Outline of Proposed Cross-Examination by Intervenor, IBEW Local 1288. Copies have been served on all parties of record.

Sincerely,

ALLEN, GODWIN, MORRIS,
LAURENZI & BLOOMFIELD, P.C.

Lee J. Bloomfield, ck
LEE J. BLOOMFIELD
Attorney at Law

LJB:cmk
Enclosures

cc: Richard Collier, Esquire, Tennessee Regulatory Authority
D. Billye Sanders, Esquire, Waller, Lansden, Dortch & Davis
John Knox Walkup, Esquire, Wyatt, Lansden, Dortch & Davis
Ward Huddleston, Memphis Networx
J. Maxwell Williams, Esquire, MLG&W
Henry Walker, Esquire, Boulton, Cummings, et al.
Charles B. Welch, Esquire, Farris, Mathews, et al.

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE:)
)
APPLICATION OF MEMPHIS)
NETWORK, LLC FOR A CERTIFICATE)
OF PUBLIC CONVENIENCE AND)
NECESSITY TO PROVIDE INTERSTATE)
TELECOMMUNICATION SERVICES)
AND JOINT PETITION OF MEMPHIS)
LIGHT, GAS & WATER DIVISION,)
A DIVISION OF THE CITY OF)
MEMPHIS, TENNESSEE ("MLG&W"))
AND A&L NETWORKS-TENNESSEE,)
LLC ("A&L") FOR APPROVAL OF)
AN AGREEMENT BETWEEN MLG&W)
AND A&L REGARDING OWNERSHIP)
OF MEMPHIS NETWORK, LLC.)

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EXECUTIVE SECRETARY

DOCKET NO. 99-00909

**OUTLINE OF PROPOSED CROSS-EXAMINATION
BY INTERVENOR, IBEW LOCAL 1288**

COMES NOW your Intervenor, the International Brotherhood of Electrical Workers, Local 1288, ("IBEW") and pursuant to the Order of Richard Collier, Pre-Hearing Officer, in the above Docket, respectfully files this Outline of Proposed Cross-examination to be submitted by the IBEW at the hearings scheduled for April 13 and 14, 2000, in the above Docket:


1. Questions relating to the manner in which the Operating Agreement of Memphis Networkx, LLC may impact the provisions of the Memorandum of Understanding between Memphis Light Gas and Water Division ("MLG&W") and Local 1288 of the IBEW, January 1, 1998 to January 1, 2002.

2. Questions relating to the intentions of MLG&W with respect to the creation of similar joint ventures in the future which would take over its gas, water and/or electric operations.
3. Questions relating to whether the MLG&W's interest in Memphis Networkx, LLC violates the provisions of Article II, Section 29 of the Tennessee Constitution.
4. Questions relating to what extent, if any, MLG&W's participation as a member of Memphis Networkx, LLC in the proposal to offer telecommunications services is affected by its charter or that of the City of Memphis.
5. Questions relating to why MLG&W is going into business with an out-of-state company that is non-union and pays low wages to its employees, and the impact of such on the Memorandum of Understanding, the IBEW, and its members.
6. Questions relating to the intentions of MLG&W and /or Memphis Networkx, LLC to use its fiber-optics technology to read meters, or provide other services currently provided by MLG&W, and thereby eliminated jobs for the members of the IBEW.
7. Questions relating to whether MLG&W's participation as a member of Memphis Networkx, LLC., puts rate payer' at risk.
8. Questions related to whether MLG&W and Memphis Networkx LLC considers Memphis Networkx LLC to be a public or private entity.

Respectfully submitted,

ALLEN, GODWIN, MORRIS,
LAURENZI & BLOOMFIELD, P.C.
200 Jefferson Avenue, Suite 1400
Memphis, Tennessee 38103
(901) 528-1702

BY: 
LEE J. BLOOMFIELD #8851

BY: 
DEBORAH GODWIN #9972

CERTIFICATE OF SERVICE

I, Lee J. Bloomfield, do hereby certify that on April 6, 2000, a copy of the foregoing document was served on the parties of record listed below via facsimile and U.S. Mail, postage prepaid, first class.

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